

1 Mark L. Javitch (CA SBN 323729)
Javitch Law Office
2 3 East 3rd Ave. Ste. 200
San Mateo, CA 94401
3 Telephone: (650) 781-8000
4 Facsimile: (650) 648-0705
mark@javitchlawoffice.com

5 *Attorney for Plaintiff*
6 And all those similarly situated

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEBRASKA
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12 ALEJANDRO VALLESILLO, individually and
on behalf of all those similarly situated,

13 Plaintiffs,

14 v.

15 STELLAR MUTUAL INC., a Delaware
corporation, STELLAR MUTUAL GLOBAL
16 INC, a Delaware corporation, DANIEL
SHARBANI, an individual, and JOHN DOE, an
17 unknown business entity,

18 Defendants.
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Case No.: 8:22-cv-00307-MDN

MOTION FOR LEAVE TO SEEK LIMITED
DISCOVERY PRIOR TO RULE 26(f)
CONFERENCE

**MOTION FOR LEAVE TO TAKE LIMITED DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE**

Pursuant to Nebraska Civil Rule 7.1 and Fed. R. Civ. P. 26, plaintiff ALEJANDRO VALLESILLO (“Plaintiff”) hereby moves the Court for leave to conduct limited discovery to ascertain classwide damages. Defendants have defaulted, yet Plaintiff needs the benefit of discovery to determine the identity of the class and the amount of damages.

Therefore, Plaintiff respectfully requests that the Court hold that good cause is established to conduct limited discovery.

Pursuant to Nebraska Civil Local Rules 7.1(d)-(f), this motion is supported by the brief in support of the motion.

Dated: December 15, 2022

Respectfully submitted,

By: /s/ Mark L. Javitch